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Co-Lead Class Counsel for Indirect-Purchaser Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE TFT-LCD (FLAT PANEL))	Case No. 3:07-MD-1827 SI
ANTITRUST LITIGATION)	MDL No. 1827
)	
This Document Relates to:)	[PROPOSED] ORDER RE: DISTRIBUTION FROM ESCROW FUNDS FOR CLAIMS ADMINISTRATION
All Indirect-Purchaser Actions;)	
)	
<i>State of Missouri, et al. v. AU Optronics</i>)	
<i>Corporation, et al.</i> , Case No. 10-cv-3619;)	
)	
<i>State of Florida v. AU Optronics Corporation,</i>)	The Honorable Susan Illston
<i>et al.</i> , Case No. 10-cv-3517; and)	
)	
<i>State of New York v. AU Optronics</i>)	
<i>Corporation, et al.</i> , Case No. 11-cv-0711.)	
)	

1 WHEREAS, on December 27, 2011, the Court granted final approval to settlements
 2 between the Indirect-Purchaser Plaintiffs (“IPPs”) and the States of Arkansas, California,
 3 Florida, Michigan, Missouri, New York, West Virginia, and Wisconsin (“Settling States”) on the
 4 one hand, and defendants Chimei, Chunghwa, Epson, HannStar, Hitachi, Samsung and Sharp, as
 5 identified in the respective Settlement Agreements, and inclusive of related entities also
 6 identified in the respective Settlement Agreements (collectively, “Group-I Settling Defendants”),
 7 on the other hand; and

8 WHEREAS, on July 30, 2012, the Court granted preliminary approval to the settlements
 9 between IPPs and the Settling States, and defendants AUO, LG and Toshiba, as identified in the
 10 respective Settlement Agreements (collectively, “Group-II Settling Defendants” and with the
 11 Group-I Settling Defendants referred to hereafter as “All Settling Defendants”), on the other
 12 hand; and

13 WHEREAS, the Settlement Agreements with All Settling Defendants provide that the
 14 costs of administration of the claims process shall be paid from the Settlement Fund of each
 15 Settling Defendant, *pro rata*, based on each Settling Defendant’s Settlement Amount; and

16 WHEREAS, the cost of claims administration invoiced by Rust Consulting is
 17 \$218,134.97 (see Exhibits 1 and 2 attached hereto); and

18 WHEREAS, pursuant to the Settlement Agreements the following amounts may be
 19 deducted from each Settling Defendant’s Settlement Fund to pay such costs of claims
 20 administration:

Chimei	\$22,230.34
Chunghwa	\$1,069.47
Epson	\$574.54
HannStar	\$5,170.86
Hitachi	\$7,857.54
Samsung	\$48,382.35
Sharp	\$23,284.00
AUO	\$32,557.29

LG	\$72,775.12
<u>Toshiba</u>	\$4,233.46
TOTAL	\$218,134.97

WHEREAS, Well Fargo Bank, N.A. has informed the parties that it requires an order from the Court before it will distribute payment for these additional costs;

THEREFORE, IT IS HEREBY ORDERED that Wells Fargo Bank, N.A. shall wire \$218,134.97 to the following account:

Bank of Texas
ABA/Routing # 111014325
Account # 8093434387
Account Name: Rust Consulting
Reference # 128325
Federal Tax ID # 41-1813634
Bank Contact: Mayra Landeros, (214) 987-8817

The balance of funds in the demand-deposit account, if any, shall be retained for additional costs as they are incurred.

IT IS SO ORDERED.

Dated: October 17, 2014

Hon. Susan Illston

Hon. Susan Illston
United States District Judge

3257728v1

EXHIBIT 1



Invoice

625 MARQUETTE AVENUE, SUITE 880
 MINNEAPOLIS, MN 55402
 P 612.359.2000 I F 612.359.2050
 WWW.RUSTCONSULTING.COM
 FEDERAL ID #: 41-1813634

DATE: 08/22/14
 INVOICE #: 14-5605
 MATTER #: 8292

TO: Francis O. Scarpulla
 Zelle Hofmann Voelbel & Mason LLP
 44 Montgomery Street
 Suite 3400
 San Francisco, CA 94104
fscarpulla@zelle.com
jdc@coopkirk.com

PROJECT
<i>LCD Indirect</i>
<i>July 2014 Claims Administration Services</i>

Project Database	\$ 294.80
Project Management	9,169.70
Technical Consulting	232.80
Website Modification	1,524.00
Document Receipting	123.20
Scanning	152.06
Correspondence/Admin Mail	3,133.00
Data Capture	76.45
Claims Validation & Audits	52,951.80
Deficiency Claim Processing	11,070.50
Mailroom & Data Capture Management	62.80
Call Center Support	4,806.96
SUBTOTAL	83,598.07

Expenses: Other Charges and Out-of-Pocket Costs	
Call Center/Telecommunications	9,156.44
Postage/Federal Express	217.81
Post Office Box Rental	1,098.97
Shredding/Storage	565.60
Photocopies/Faxing/Printing	275.00
Address Traces	300.00
Website Hosting	11,613.82
SUBTOTAL	11,613.82

TOTAL INVOICE \$ 95,211.89

PAYMENT TERMS: NET DUE UPON RECEIPT

WIRE INFORMATION

ACCOUNT #: 8093434387
 ABA/ROUTING # WIRE or ACH: 111014325
 BANK: BANK OF TEXAS, DALLAS, TX 75225
 BANK CONTACT: MAYRA LANDEROS 214.987.8817
 REFERENCE: INVOICE NUMBER

RUST

PAYMENT MAILING ADDRESS:
 P O BOX 142589
 DRAWER #9051
 Irving, TX 75014-2589

EXHIBIT 2



Invoice

625 MARQUETTE AVENUE, SUITE 880
 MINNEAPOLIS, MN 55402
 P 612.359.2000 I F 612.359.2050
 WWW.RUSTCONSULTING.COM
 FEDERAL ID #: 41-1813634

DATE: 09/05/14
 INVOICE #: 14-5716
 MATTER #: 8292

TO: Francis O. Scarpulla
 Zelle Hofmann Voelbel & Mason LLP
 44 Montgomery Street
 Suite 3400
 San Francisco, CA 94104
fscarpulla@zelle.com
jdc@coopkirk.com

PROJECT
<i>LCD Indirect</i>
<i>August 2014 Claims Administration Services</i>

Project Database	\$ 2,823.30
Project Management	17,828.46
Technical Consulting	479.80
Website Modification	136.50
Document Receipting	246.40
Scanning	409.20
Correspondence/Admin Mail	2,763.60
Data Capture	68.75
Claims Validation & Audits	66,744.50
Deficiency Claim Processing	8,228.87
Mailroom & Data Capture Management	92.40
Call Center Support	8,005.19
Bank Account Mgmt/Tax Reporting	792.00
SUBTOTAL	108,618.97

Expenses: Other Charges and Out-of-Pocket Costs	
Call Center/Telecommunications	5,698.18
Postage/Federal Express	777.01
Shredding/Storage	1,104.78
Photocopies/Faxing/Printing	6,424.14
Website Hosting	300.00
SUBTOTAL	14,304.11
TOTAL INVOICE	\$ 122,923.08

WIRE INFORMATION

ACCOUNT #: 8093434387
 ABA/ROUTING # WIRE or ACH: 111014325
 BANK: BANK OF TEXAS, DALLAS, TX 75225
 BANK CONTACT: MAYRA LANDEROS 214.987.8817
 REFERENCE: INVOICE NUMBER

RUST

PAYMENT MAILING ADDRESS:
 P O BOX 142589
 DRAWER #9051
 Irving, TX 75014-2589

PAYMENT TERMS: NET DUE UPON RECEIPT